

1 ANDREW C. MUZI, ESQ., SBN 132282
amuzi@muzilaw.com

2 DANA L. HARRIS, ESQ., SBN 220668
dharris@muzilaw.com

3 MUZI & ASSOCIATES
1851 E. FIRST STREET, SUITE 1257
4 SANTA ANA, CALIFORNIA 92705-4017
Tel. 949-553-9277 // Fax 949-553-9288

5 JOHN W. RALLS (CA Bar No. 148233)
jralls@thelen.com

6 JOHN A. FOUST (CA Bar No. 218824)
jfoust@thelen.com

7 JOANNA ROSEN (CA Bar No. 244943)
jrosen@thelen.com

8 THELEN REID BROWN RAYSMAN & STEINER LLP
9 101 Second Street, Suite 1800
San Francisco, CA 94105
10 Tel. 415.371.1200 // Fax 415.371.1211

11 Attorneys for Defendants
12 DICK/MORGANTI, DICK CORPORATION, THE MORGANTI GROUP,
13 AMERICAN CASUALTY COMPANY OF READING, PA,
NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA and
CONTINENTAL CASUALTY COMPANY

14 UNITED STATES DISTRICT COURT

15 NORTHERN DISTRICT OF CALIFORNIA—SAN FRANCISCO DIVISION

16
17 UNITED STATES OF AMERICA for the Use and
18 Benefit of ISEC, INC.,

19 Plaintiffs,

20 vs.

21 DICK/MORGANTI, a joint venture, DICK
22 CORPORATION, THE MORGANTI GROUP,
23 AMERICAN CASUALTY COMPANY OF
READING, PA, NATIONAL UNION FIRE
24 INSURANCE COMPANY OF PITTSBURGH, PA,
CONTINENTAL CASUALTY COMPANY, and
DOES 1 through 10, inclusive,

25 Defendants.

Case No.: 3:08-CV-01932 –PJH

**STIPULATION AND [PROPOSED]
ORDER EXTENDING CASE
SCHEDULE AND CASE
MANAGEMENT CONFERENCE**

Judge: Hon. Phyllis J. Hamilton

1 Pursuant to Civil Rule 6-2, the parties, Use Plaintiff ISEC, Inc. ("ISEC"), on the one hand,
2 and Defendants Dick/Morganti, a Joint Venture ("Dick/Morganti"), Dick Corporation, The
3 Morganti Group, American Casualty Company of Reading, Pennsylvania; Continental Casualty
4 Company; National Union Fire Insurance Company of Pittsburgh, PA, on the other, hereby
5 stipulate and agree as follows:

6 This case arises out of the construction of the construction of the San Francisco Federal
7 Building. Since the date the complaint was filed, the parties have discussed how to resolve (or at
8 least narrow) the issues between them arising out of the Project, and these discussions continue.
9 In particular, the parties are discussing the extent to which the claims asserted by ISEC are
10 properly the subject of Dick/Morganti's claim against the Project owner, the United States General
11 Services Administration. Under the circumstances, the parties desire to continue the various case
12 management deadlines that have been established by 14 days.

13 The parties have previously stipulated, and the Court has previously allowed, time
14 extensions for the response to the complaint to June 27 and June 16, 2008. The parties have filed
15 the ADR Certification.

16 The parties stipulate and agree that the following case schedule should be established:

- 17 ➤ Deadline for defendants' response to complaint: July 30, 2008.
- 18 ➤ Last day to file Rule 26(f) report, complete initial disclosures or state objection in
19 Rule 26(f) report and file case management statement per Standing Order re
20 Contents of Joint Case Management Statement: July 31, 2008.
- 21 ➤ Initial Case Management Conference: On or about August 7, 2008, on a date to be
22 set by the Court.

23 A declaration in support of this stipulated request is attached.
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2 Dated: July 16, 2008

MUZI & ASSOCIATES

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4 By: /s/ Andrew C. Muzi
5 Andrew C. Muzi
6 Attorney for ISEC, INC.

7 Dated: July 16, 2008

THELEN REID BROWN RAYSMAN & STEINER LLP

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9 By: /s/ John W. Ralls
10 John W. Ralls
11 Attorneys for Defendants DICK/MORGANTI, DICK
12 CORPORATION, THE MORGANTI GROUP,
13 AMERICAN CASUALTY COMPANY OF
14 READING, PA, NATIONAL UNION FIRE
15 INSURANCE COMPANY OF PITTSBURGH, PA
16 and CONTINENTAL CASUALTY COMPANY

13 **ORDER**

14 PURSUANT TO STIPULATION, IT IS SO ORDERED.

15 The Court sets the initial case management conference (previously scheduled for July 24,
16 2008) for _____, 2008 in Courtroom 3, 17th Floor, San Francisco at
17 _____.

18
19 Dated: _____, 2008

20
21 _____
22 Hon. Phyllis J. Hamilton
23 United States District Court
24 Northern District of California
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DECLARATION OF JOHN W. RALLS

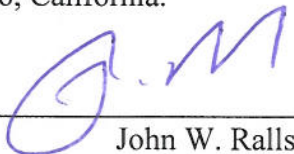
I, John W. Ralls, declare:

1. I am an attorney-at-law, a partner with Thelen Reid Brown Raysman & Steiner LLP and counsel of record for the defendants in this case, including defendant Dick/Morganti, a joint venture.

2. The plaintiff, ISEC, Inc. and the defendants, are engaged in settlement negotiations that may resolve this case partially, if not entirely. This case arises from the construction of the San Francisco Federal Building ("Project"). A major issue in the on-going discussions is whether and to what extent ISEC's claims are properly the subject of Dick/Morganti's claims against the Project owner, the United States General Services Administration, and so should not be prosecuted against the defendants.

3. I declare under penalty of perjury under the law of the United States that the foregoing is true and correct.

Executed on July 16, 2008, in San Francisco, California.



John W. Ralls